

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM, RICHARD §
KING, MICHAEL DENTON, FRED WALLACE, §
and MARVIN RAY YATES, individually and on §
behalf of those similarly situated, §

Plaintiffs, §

v. §

BRYAN COLLIER, in his official capacity, §
ROBERTO HERRERA, in his official capacity, and §
TEXAS DEPARTMENT OF CRIMINAL JUSTICE, §

Defendants. §

CIVIL ACTION NO.
4:14-cv-1698

PLAINTIFFS' MOTION FOR CONTEMPT, TO SHOW CAUSE & SANCTIONS

Exhibit 5

Declaration of J. Crocker

DECLARATION OF JOHN CROCKER

1. My name is JOHN CROCKER.

2. My date of birth is 11/15/1982.

3. My TDCJ number is 1589500.

4. ~~I have been an inmate in the Texas Department of Criminal Justice (TDCJ)'s Wallace Pack Unit in Grimes County, Texas since~~

5. I am assigned to the Stiles Unit at 12-D-B-28.

6. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated herein are within my knowledge and are true and correct.

sc • THE AIR CONDITIONING HAS NOT BEEN WORKING
IN MY HOUSING AREA AT THE STILES UNIT FOR SEVERAL
DAYS, INCLUDING APPROXIMATELY JULY 3, 2019 to
JULY 14, 2019.

sc • I HAVE FELT HOT, SWEATY, DIZZY, AND
NAUSEOUS IN MY HOUSING AREA AT STILES.

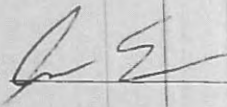
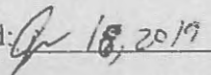
sc • I AM NOT PERMITTED TO TAKE COLD SHOWERS
AT STILES.

Q I HAVE HEARD PEOPLE REQUEST TO GO TO A
RESPITE AREA IN MY HOUSING AREA AND TDCJ
OFFICERS REFUSE THEM

Q I AM PRESCRIBED LITHIUM AND CELEXA

Q THE COOLER IN MY HOUSING AREA OFTEN HAS
NO ICE DURING THE DAY.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature:  Dated: 

Printed Name: John Crocker